Case	2:16-cv-02129-SJO-RAO Document 214-1 #:4374	. Filed 01/31/17 Page 1 of 3 Page ID
1 2 3 4 5 6 7	HANSON BRIDGETT LLP KURT A. FRANKLIN, SBN 172715 kfranklin@hansonbridgett.com SAMANTHA WOLFF, SBN 240280 swolff@hansonbridgett.com CAROLINE LEE, SBN 293297 clee@hansonbridgett.com JENNIFER ANIKO FOLDVARY, SBN jfoldvary@hansonbridgett.com 425 Market Street, 26th Floor San Francisco, California 94105 Telephone: (415) 777-3200 Facsimile: (415) 541-9366	292216
8 9 10 11 12	HANSON BRIDGETT LLP TYSON M. SHOWER, SBN 190375 tshower@hansonbridgett.com LANDON D. BAILEY, SBN 240236 Ibailey@hansonbridgett.com 500 Capitol Mall, Suite 1500 Sacramento, California 95814 Telephone: (916) 442-3333 Facsimile: (916) 442-2348	
13 14 15 16 17	OTTEN LAW, PC VICTOR OTTEN, SBN 165800 vic@ottenlawpc.com KAVITA TEKCHANDANI, SBN 23487 kavita@ottenlawpc.com 3620 Pacific Coast Highway, #100 Torrance, California 90505 Telephone: (310) 378-8533 Facsimile: (310) 347-4225	73
18 19 20	Attorneys for Plaintiffs CORY SPENCER, DIANA MILENA REED, and COASTAL PROTECTION RANGERS, INC.	J
21	UNITED STATES	DISTRICT COURT
22	CENTRAL DISTRICT OF CAL	IFORNIA, WESTERN DIVISION
23		
24	CORY SPENCER, an individual; DIANA MILENA REED, an	CASE NO. 2:16-cv-02129-SJO (RAOx)
25 26	individual; and COASTAL	DECLARATION OF SAMANTHA WOLFF IN SUPPORT OF
26 27	PROTECTION RANGERS, INC., a California non-profit public benefit	PLAINTIFFS' RESPONSE TO BLAKEMAN'S REQUEST FOR JUDICIAL NOTICE
27 28	corporation,	Judge: Hon. S. James Otero
		-1- Case No. 2:16-cv-02129-SJO (RAOx)
	DECL. WOLFF SUPP. PLTF.'S RESP. TO BLAKEM	

13085349.1

Case	2:16-cv-02129-SJO-RAO Document 214-1 #:4375	Filed 01/31/17 Page 2 of 3 Page ID	
1 2	Plaintiffs, v.	Date: February 21, 2017 Time: 10:00 a.m. Crtrm.:10C	
3	LUNADA BAY BOYS; THE		
4	INDIVIDUAL MEMBERS OF THE		
5	LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT		
6	BLAKEMAN, ALAN JOHNSTON		
7	AKA JALIAN JOHNSTON,		
8	MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK		
9	FERRARA, CHARLIE FERRARA,		
10	and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF		
11	POLICE JEFF KEPLEY, in his		
12	representative capacity; and DOES 1-10,		
13	Defendente		
14	Defendants.		
15	I, Samantha Wolff, declare as fo	llows:	
16	1. I am an attorney duly admitted to practice before this Court. I am		
17	a partner with Hanson Bridgett LLP, a	nd my firm, along with Otten Law PC,	
18	is counsel of record for Plaintiffs Cory	Spencer, Diana Milena Reed, and	
19	Coastal Protection Rangers, Inc. in thi	s matter. I have personal knowledge	
20	of the facts set forth herein, except as to those stated on information and		
21	belief and, as to those, I am informed	and believe them to be true. If called	
22	as a witness, I could and would compe	etently testify to the matters stated	
23	herein.		
24	2. Attached as Exhibit A is a	true and correct copy of relevant	
25	excerpts from the deposition of Plainti	ff Diana Milena Reed, taken October	
26	24-25, 2016 in Santa Monica, Californ	ia. The relevant excerpts are from the	
27	second day of testimony, on October 25, 2016, and appear in Volume II of		
28	the deposition transcript.		
	DECL. WOLFF SUPP. PLTF.'S RESP. TO BLAKEM/	-2- Case No. 2:16-cv-02129-SJO (RAOx)	
	DECL. WOLFF SUPP. PLIF.'S RESP. TO BLAKEM	AN'S KEQ. FOR JUDICIAL NOT.	

Case	2:16-cv-02129-SJO-RAO Document 214-1 Filed 01/31/17 Page 3 of 3 Page ID #:4376
1	I declare under penalty of perjury under the laws of the United States
2	of America that the foregoing is true and correct.
3	Executed January 31, 2017, at Walnut Creek, California.
4	
5	/s/ Samantha D. Wolff
6	Samantha D. Wolff
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
13085349.1	-3- Case No. 2:16-cv-02129-SJO (RAOx) DECL. WOLFF SUPP. PLTF.'S RESP. TO BLAKEMAN'S REQ. FOR JUDICIAL NOT.